

LITE DEPALMA GREENBERG & AFANANDOR, LLC

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Attorney for Plaintiffs and the Proposed Class

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

HEATHER ALTMAN and ELIZA WIATROSKI,
Individually and on Behalf of All Others Similarly
Situated,

Plaintiffs,

v.

CEASERS ENTERTAINMENT, INC.,
BOARDWALK REGENCY LLC d/b/a CEASERS
ATLANTIC CITY HOTEL & CASINO, HARRAH'S
ATLANTIC CITY OPERATING COMPANY, LLC
d/b/a HARRAH'S RESORT ATLANTIC CITY
HOTEL & CASINO, TROPICANA ATLANTIC
CITY CORPORATION d/b/a TROPICANA CASINO
AND RESORT ATLANTIC CITY, MGM RESORTS
INTERNATIONAL, MARINA DISTRICT
DEVELOPMENT COMPANY, LLC d/b/a
BORGATA HOTEL CASINO & SPA, HARD ROCK
INTERNATIONAL INC., SEMINOLE HARD
ROCK SUPPORT SERVICES, LLC, BOARDWALK
1000, LLC d/b/a HARD ROCK HOTEL & CASINO
ATLANTIC CITY, and CENDYN GROUP, LLC,

Defendants.

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: Civil Action No.: 1:23-cv-02536-KMW-EAP
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: **NOTICE OF MOTION FOR *PRO HAC***
: ***VICE* ADMISSION OF VINEET BHATIA,**
: **SHAWN L. RAYMOND, STEPHEN E.**
: **MORRISSEY AND BENJAMIN MANNE**

PLEASE TAKE NOTICE that on August 21, 2023 at 10:00 a.m., or as soon thereafter
as counsel may be heard, Heather Altman and Eliza Wiatroski ("Plaintiffs") will move before
Honorable Elizabeth A. Pascal, U.S.M.J. at the United States District Court, Mitchell H. Cohen

Building & U.S. Courthouse, 4th & Cooper Streets, Camden, NJ 08101, for an order admitting Vineet Bhatia, Shawn L. Raymond, Stephen E. Morrissey and Benjamin Manne; and it appearing that Vineet Bhatia is a partner with the law firm Susman Godfrey L.L.P., located at 1000 Louisiana Street, Suite 5100, Houston, Texas 77002; Shawn L. Raymond is a partner with the law firm Susman Godfrey L.L.P., located at 1000 Louisiana Street, Suite 5100, Houston, Texas 77002; Stephen E. Morrissey is a partner with the law firm Susman Godfrey L.L.P., located at 401 Union Street, Suite 3000 Seattle, WA 98101; and Benjamin Manne is an attorney with the law firm Susman Godfrey L.L.P., located at 401 Union Street, Suite 3000 Seattle, WA 98101, *pro hac vice* for all purposes in the above-captioned matter.

PLEASE TAKE FURTHER NOTICE that in support of Plaintiffs' motion are the Certifications of Joseph J. DePalma, Vineet Bhatia, Shawn L. Raymond, Stephen E. Morrissey and Benjamin Manne. A proposed form of Order is also submitted herewith.

PLEASE TAKE FURTHER NOTICE that because this application being made is pursuant to Local Rule 101.1(c) and is within the discretion of the Court, no brief is necessary.

PLEASE TAKE FURTHER NOTICE that Plaintiffs hereby request that this motion be decided on the papers pursuant to Rule 78 of the Federal Rules of Civil Procedure.

LITE DEPALMA GREENBERG & AFANADOR, LLC

Dated: July 20, 2023

/s/ Joseph J. DePalma
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